

1 HEATHER E. WILLIAMS, SBN #122664  
Federal Defender  
2 HANNAH LABAREE, # 294338  
Assistant Federal Defender  
3 801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
4 Tel: 916-498-5700/Fax 916-498-5710  
Attorneys for Defendant  
5 JUAN CARLOS MARTINEZ CASTRO

6  
7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,	)	Case No. 2:19-cr-233 DAD-1
	)	
10 Plaintiff,	)	STIPULATION AND ORDER TO CONVERT
	)	CHANGE OF PLEA TO STATUS CONFERENCE
11 vs.	)	
	)	Date: May 30, 2023
12 JUAN CARLOS MARTINEZ	)	Time: 9:30 a.m.
13 CASTRO, ET AL.	)	Judge: Hon. Dale A. Drozd
	)	
14 Defendant.	)	
<hr/>		

15  
16 IT IS HEREBY STIPULATED by and between the parties hereto through their  
17 respective counsel, U.S. Attorney Phillip A. Talbert, through Assistant United States Attorney  
18 Justin Lee, attorney for Plaintiff, and Federal Defender Heather Williams, through Assistant  
19 Federal Defender Hannah Labaree, attorney for defendant Juan Carlos Martinez Castro, that the  
20 previously-scheduled change of plea hearing date of May 30, 2023, be converted to a status  
21 conference.

22 Counsel for Mr. Martinez Castro requires additional time to consult with her client  
23 regarding the sentencing exposure and immigration consequences of a conviction in this case, to  
24 consult with her client regarding the evidence, and to undertake other necessary preparations for  
25 trial in the instance the case does not resolve in a plea. Mr. Castro therefore is not yet prepared to  
26 enter a plea or set the matter for trial.

27 The parties therefore request that the Change of Plea be converted to a Status Conference.  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Respectfully submitted,

Dated: May 24, 2023

HEATHER E. WILLIAMS  
Federal Defender

/s/ Hannah Labaree  
HANNAH LABAREE  
Assistant Federal Defender  
Attorney for Defendant  
Juan Carlos Martinez Castro

Dated: May 24, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ Justin Lee  
JUSTIN LEE  
Assistant U.S. Attorney  
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The Court ORDERS that the Change of Plea Hearing be converted to a Status Conference to be held on the same date. However, the court will discuss with the parties at the status conference whether trial and trial confirmation dates should be set at this time, certainly without prejudice to the matter being scheduled for a change of plea hearing if appropriate.

IT IS SO ORDERED.

Dated: May 24, 2023

Dale A. Drozd  
UNITED STATES DISTRICT JUDGE